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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

United States of America,  
  
Plaintiff,  
  
v.  
  
Matthew Okeke, M.D.,  
  
Defendant.

Case No. 2:23-cv-01861-JAD-BNW

**Stipulation to Extend Remaining  
Discovery Deadlines**

**(Sixth Request)**

Pursuant to LR IA 6-1 and LR 26-3, the parties request a thirty (30) day extension of the remaining discovery deadlines, which is supported by grounds and circumstances set forth below. This is the sixth request for an extension of the discovery deadlines.

**DISCOVERY COMPLETED**

The parties have completed the following discovery:

1. Plaintiff made its initial disclosures on March 12, 2024.
2. Plaintiff served its first set of requests for production of documents, first set of interrogatories and first set of requests for admission to Plaintiff on April 25, 2024.
3. Defendant responded to Plaintiff's first requests for admission on May 23, 2024.

4. Plaintiff completed the deposition of Defendant on February 28, 2025.

5. Plaintiff served a Second Request for Production of Documents to Defendant on March 11, 2025. Defendant has yet to provide responses to the Requests.

### **EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER**

The discovery period is now closed. The parties seek to extend the remaining two deadlines for dispositive motions and the Proposed Joint Pretrial Order. The Assistant United States Attorney currently assigned to this case is unavailable to litigate this matter at this time and the undersigned counsel is in need of additional time to complete pretrial litigation. The parties agree that neither party will be prejudiced by the proposed extension and that the extension is sought in good faith.

The following table sets forth the current deadlines and the proposed thirty (30) day extension of discovery deadlines that are the subject of this stipulated request:

<b>SCHEDULED EVENT</b>	<b>CURRENT DEADLINE</b>	<b>PROPOSED DEADLINE</b>
Initial Expert Disclosure	<b>March 28, 2025</b>	
Rebuttal Expert Report(s)	<b>April 28, 2025</b>	
Discovery Cutoff	<b>May 28, 2025</b>	
Dispositive Motions	<b>June 27, 2025</b>	<b>July 28, 2025<sup>1</sup></b>
Proposed Joint Pretrial Order	<b>July 28, 2025<sup>2</sup></b>	<b>August 28, 2025</b>

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<sup>1</sup> July 27, 2025 is a Sunday. If dispositive motions were to be filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.

1 This request for an extension of time is not sought for any improper purpose  
2 including delay.

3 Respectfully submitted this 27<sup>th</sup> day of June 2025.

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5 LAW OFFICES OF LIBO  
6 AGWARA, LTD

SIGAL CHATTAH  
United States Attorney

7  
8 /s/ Liborius Agwara  
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13 **IT IS SO ORDERED:**

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**UNITED STATES MAGISTRATE JUDGE**

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16 **DATED:** 6/30/2025  
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